## Case 2:15-cv-01047-JCM-VCF Document 17 Filed 09/17/15 Page 1 of 2 Marc V. Kalagian Attorney at Law: 4460 Law Offices of Rohlfing & Kalagian, LLP 211 East Ocean Boulevard, Suite 420 Long Beach, CA 90802 Tel.: (562)437-7006 Fax: (562)432-2935 E-mail rohlfing.kalagian@rksslaw.com Attorneys for Plaintiff RONALD D. SALTENIS UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA** RONALD D. SALTENIS, Case No.: 2:15-cv-01047-JCM-VCF Plaintiff, STIPULATION TO EXTEND **BRIEFING SCHEDULE (First** Request) VS. CAROLYN W. COLVIN, Acting Commissioner of Social Security, Defendant Plaintiff Ronald D. Saltenis ("Plaintiff") and defendant Carolyn Colvin,

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Plaintiff Ronald D. Saltenis ("Plaintiff") and defendant Carolyn Colvin, Commissioner of Social Security ("Defendant"), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand to October 20, 2015; and that Defendant shall have until November 19, 2015, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due December 9, 2015.

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| 1  | An extension of time for plaintiff is needed in order to properly address the        |
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| 2  | issues within the administrative record in this matter. Counsel sincerely apologizes |
| 3  | to the court for any inconvenience this may have had upon it or its staff.           |
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| 6  | DATE: September 16, 2015, Respectfully submitted,                                    |
| 7  | ROHLFING & KALAGIAN, LLP   |
| 8  | 15/ Mara 91 Valacian   |
| 9  | /s/ Marc V. Kalagian BY:   |
| 10 | Marc V. Kalagian Attorney for plaintiff RONALD D. SALTENIS                           |
| 11 | DATED G  |
| 12 | DATED: September 16, 2015 Daniel G. Bogden<br>United States Attorney                 |
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| 14 | */S/- Richard Rodriguez  |
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| 16 | Richard Rodriguez Special Assistant United States Attorney                           |
| 17 | Attorney for Defendant   |
| 18 | [*Via email authorization]   |
| 19 | No further extensions will be granted, absent compelling reasons for further delay.  |
| 20 | IT IS SO ORDERED:  |
| 21 | Contacto   |
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| 23 | UNITED STATES MAGISTRATE JUDGE   |
| 24 | September 17, 2015 DATED:  |
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